

JUN 4 1989

For Six Month Period Ending _____

(Insert date)

Name of Registrant Arnold & Porter

Registration No. 1750

Business Address of Registrant 1200 New Hampshire Ave., N.W.
Washington, D.C. 20036

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: N/A

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1. N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name
Merrick Garland
Robert Herzstein
Thomas Wilner

Position
Partner
Partner
Partner

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

89 JUL 25 5:10

RECEIVED
DEPT OF JUSTICE
CRIMINAL DIVISION

Date Connection
Ended
February 17, 1989
March 31, 1989
March 31, 1989

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
*See Attachment No. 1				

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☒ No ☐

If yes, identify each such person and describe his services.

Vivian Berzinski has rendered services to foreign principals. In addition, Jeffrey Smith and Irvin B. Nathan, who became partners during earlier periods, began to render services to foreign principals during this period.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
*See Attachment No. 2		

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
*/ See Attachment No. 3			

II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒

No ☐

If yes, furnish the following information:

Name of foreign principal

Date of Termination

See Attachment No. 4

9. Have you acquired any new foreign principal¹ during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

See Attachment No. 5

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 6

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 7

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 8

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).
⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS—MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 9

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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*/ See Attachment No. 10

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal. N/A

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☐ N/A

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____ N/A

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____ N/A

21. What language was used in this political propaganda:

☐ English ☐ Other (specify) _____ N/A

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐ N/A

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ N/A

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐ N/A

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following: N/A

Exhibit A⁶ Yes ☐ No ☐
 Exhibit B⁷ Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐ N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Patrick FJ Macrory

Subscribed and sworn to before me at WASHINGTON, D.C.

this 25th day of July, 19 89

W. J. Gar Roberts
(Signature of notary or other officer)

My Commission Expires June 18, 1998

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

ARNOLD & PORTER

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TELEX 89-2733

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(303) 863-1000

KENNETH I. JUSTER
DIRECT LINE (202) 872-6753

January 25, 1989

Mr. R. Richard Newcomb
Director, Office of Foreign
Assets Control
Department of the Treasury
1331 G Street, N.W., 5th Floor
Washington, D.C. 20220

Dear Rick:

I am writing with regard to your letter of January 19, 1989 and the materials enclosed therewith. It is unclear to me from the enclosed materials whether any of the organizations (other than the Panama Canal Commission) requesting a return of payments from accounts at the Federal Reserve Bank of New York already have made similar payments to the Noriega regime in Panama. If not, is there current pressure from Noriega for those organizations to make these back payments? Again, if not, then I am not sure it would be in the interests of either the U.S. Government or the Government of Panama to have such payments made to Noriega at this time. And, if such payments are not to be made to Noriega, then the amounts in question should remain at the Federal Reserve Bank of New York rather than be returned as a windfall to each of the organizations involved.

I would appreciate clarification from your office on these points.

Sincerely,



Kenneth I. Juster

cc: Mr. Raul de St. Malo
Embassy of Panama

Attachment 1

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

☒ Yes ☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
Vivian Berzinski	12204 Cedar Hill Dr. Silver Spring, MD 20904	USA	Partner	January 1, 1989
Mark Boscoe	6795 E. Exposition Ave. Denver, CO 80224	USA	Partner	January 1, 1989
Gary Humes	632 C Street, N.E. Washington, D.C. 20002	USA	Partner	January 1, 1989
Barbara Mathews	2737 Devonshire Pl., N.W. Washington, D.C. 20008	USA	Partner	January 1, 1989

Attachment 2

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month period?

☒ Yes ☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Position</u>	<u>Date Terminated</u>
Kevin Dempsey	Associate	January 25, 1989
Shari Edelstein	Associate	February 1, 1989
Richard Neff	Associate	February 17, 1989
Jitzchak Alster	Foreign Associate	February 23, 1989
Daniel Esty	Associate	March 17, 1989
Jeffrey Winton	Associate	March 31, 1989
Stephan Becker	Associate	March 31, 1989
Young-gak Yun	Associate	April 19, 1989
Judith Shapiro	Associate	April 28, 1989
Don Leatherman	Associate	May 16, 1989
Shelley Slade	Associate	May 22, 1989

In addition, Michele Brace, Patricia Dilley, Daniel Kagan, Brian Leitch, Paul MacWhorter, Jr. and Kathleen Wallman, who have previously filed Short-Form Registration Statements, will not be rendering services to any of Registrant's foreign principals. These Short-Form Registrations are hereby terminated.

Attachment 3

7. During this 6 month reporting period have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

☐ Yes ☒ No */

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Citizenship</u>	<u>Date Connection Began</u>
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N/A

*/ However, the following persons, hired previously, began to render services to foreign principals during this period:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Citizenship</u>	<u>Date Connection Began</u>
Jeffrey Blutinger	1021 Arlington Blvd. Arlington Virginia 22209	Associate	October 17, 1988
Roberta Corne	9404 Bulls Run Parkway Bethesda, Maryland 20817	Associate	November 30, 1987
Robert Danforth	229 Dale Drive Silver Spring, Maryland 20910	Associate	November 30, 1987
Melanie Fein	562 Innsbruck Avenue Great Falls, Virginia 22066	Associate	November 3, 1986
Daniel Kagan	642 Independence Avenue, S.E., #2 Washington, D.C. 20003	Associate	October 19, 1987
Lois Lupica	201 W. 74th Street #10D New York, New York 10023	Associate	September 26, 1988

Douglas Michael	1317 N. Quincy Street Arlington, Virginia 22201	Associate	October 13, 1987
Young-gak Yun	2072 Van Tuyl Place Falls Church, Virginia 22043	Associate	September 12, 1988

Attachment 4

8. Has your connection with any foreign principal ended during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name of Foreign Principal</u>	<u>Date of Termination</u>
Ambassador of the Swiss Confederation	May 15, 1989
Amok Ltd, Cameco (formerly Saskatchewan Mining Development Corporation), Eldorado Resources Limited and Uranerz Exploration and Mining Limited	December 31, 1988
ASEA Brown Boveri	March 31, 1989
Consejo Empressarial Mexicano para Asuntos Internacionales (CEMAI)	April 1, 1989
Fair Trade Center	June 4, 1989 ¹
Government of Canada	March 31, 1989
Inter-American Development Bank (IDB)	June 4, 1989 ¹
International Bank for Reconstruction and Development (IBRD)	June 4, 1989 ¹

¹ After this date, representation of this foreign principal is limited to activities exempt from registration under Section 3 of the Act.

Attachment 5

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6-month reporting period.

State of Israel
International Commodities Clearing House, Ltd.
The London Commodity Exchange (1986) Ltd.
British American Arts Association (U.K.) Ltd.
The London International Financial Futures
Exchange Ltd.
Korea Foreign Trade Association
Republic of Venezuela
Banco Central do Brasil
Government of Brazil
Venezolana de Cementos CA
Profilo Holding A.S.
The Grain and Feed Trade Association
The Metal Market and Exchange Company Limited
Government of Aruba
Asocolflores
Airbus Industrie
The International Petroleum
Exchange of London Limited
Government of the Republic of Panama of which
Eric Arturo Delvalle is the legitimate
President
Joint Exchanges Committee

Attachment 6

11. During this 6-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9 and 10 of this statement?

☒ Yes

☐ No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning judicial assistance, trademarks, immigration, securities and trade.

Amok Ltd., Cameco (formerly Saskatchewan Mining Development Corporation), Eldorado Resources, Limited, Uranerz Exploration and Mining Limited

The Registrant rendered advice on U.S. laws, regulations, policies and proposed legislation relating to imports of uranium and represented the principal in a Section 232 investigation before the Department of Commerce.

ASEA Brown Boveri

The Registrant rendered advice on U.S. laws, regulations and policies regarding buy national legislation.

Airbus Industrie

The Registrant rendered advice on U.S. laws, regulations and policies concerning taxation and international trade in civil aircraft, manufacture and sale of civil aircraft.

Asocolflores

The Registrant rendered advice on U.S. laws, regulations and policies concerning international trade, trade developments, proposed trade legislation, customs procedures, drug enforcement, and taxation and assisted the principal in developing a U.S. public relations campaign. The Registrant also represented the principal

in antidumping and countervailing duty hearings and proceedings before the U.S. Department of Commerce, the U.S. Court of International Trade and the Court of Appeals for the Federal Circuit, concerning imports of flowers from Colombia.

Banco Central do Brasil and Government of Brazil

The Registrant rendered advice on U.S. laws, regulations and policies concerning economic issues, taxation, banking, international trade, the GATT, securities, and U.S. policy on foreign debt issues. The Registrant also represented the principals with respect to the restructuring of Brazilian external commercial bank debt and with respect to an international trade proceeding.

British American Arts Association (U.K.) Ltd.

One of the Registrant's partners served as a member of the Board of Directors of the principal, provided general information in response to inquiries on the services and activities of the principal, and advised the principal about arts exchange programs and related developments originating in the United States.

Consejo Empresarial Mexicano para Asuntos Internacionales, A.C. (CEMAI)

The Registrant rendered advice on U.S. laws, regulations, policies and proposed legislation in connection with U.S.-Mexico trade and investment relations.

Government of Aruba

The Registrant rendered advice on U.S. laws, regulations and policies relating to U.S.-Aruba tax treaty negotiations.

Government of Canada

The Registrant rendered advice on GATT issues and on U.S. laws, regulations, policies and proposed legislation relating to the U.S.-Canada Free Trade Agreement and on U.S. Customs requirements.

7/25/89

Government of Republic of Panama

The Registrant rendered advice to the Government of the Republic of Panama (in exile), led by President Eric Arturo Delvalle, on U.S. laws, regulations, and policies relating to U.S.-Panama relations, international taxation, U.S. sanctions against the Noriega regime, and provided representation before the Federal Reserve Bank of New York and the U.S. Departments of Treasury and State regarding Panamanian assets in the United States, banking issues, U.S. government policy toward Panama and future U.S. financial assistance to Panama. The Registrant also represented the principal in various lawsuits in various U.S. courts relating to access to assets of the Government of Panama in the United States.

Inter-American Development Bank (IDB) and the International Bank for Reconstruction and Development (IBRD)

The Registrant rendered advice on U.S. laws, regulations, policies, and proposed legislation concerning banking, taxation, and pension fund investments. The Registrant also represented the principal in preparing tax disclosure documents and a request for rulings before the Internal Revenue Service, and represented the IDB in a contract dispute and related litigation.

Japan Fair Trade Center

The Registrant rendered advice on the GATT and U.S. laws, regulations and policies concerning international trade, trade developments, and proposed trade legislation.

Korea Foreign Trade Association

The Registrant rendered advice on U.S. laws, regulations and policies concerning international trade, trade developments, proposed trade legislation, and international monetary policies. The Registrant also provided data and rendered advice to the Korean government on the GATT and GATT negotiations, investment restriction negotiations with the United States, economic issues and other trade matters.

The London Commodity Exchange (1986) Limited, The International Commodities Clearing House, Ltd., The Metal Market and Exchange Co., Ltd., The Grain and Feed Trade Association, The London International Financial Futures Exchange Ltd., The International Petroleum Exchange of London Limited, Joint Exchanges Committee

The Registrant rendered advice on U.S. laws, regulations, policies, and legislation concerning the offer and sale of foreign options and futures contracts in the United States, futures commission merchants, jurisdiction, and futures markets.

Profilo Holding A.S.

The Registrant rendered advice with respect to U.S. laws, regulations, policies, and proposed legislation that may affect or relate to the activities of the foreign principal and to Turkish/U.S. relations.

Republic of Venezuela

The Registrant rendered advice on U.S. laws, regulations and policies concerning economic issues, taxation, banking, international trade, securities and business transactions. The Registrant represented the principal with respect to implementation of agreements with commercial banks, the International Bank for Reconstruction and Development, the International Monetary Fund, and the U.S. Treasury Department concerning the restructuring of Venezuelan external debt and new financings. The Registrant also represented the principal in a lawsuit in the Southern District of New York and rendered advice concerning other litigation in the United States relating to the liquidation of Banco de Comercio.

State of Israel

The Registrant rendered advice on U.S. laws, regulations, policies, and proposed legislation concerning taxation, securities, and international trade. The Registrant represented the Government of Israel in connection with its refinancing of U.S. Foreign Military Sales Debt, which representation included the rendering of advice on U.S. laws, regulations and policies relating to securities, and rendered advice regarding pending litigation of government incentive loans, to which the State of Israel is not a party. The Registrant also rendered advice to Israel Military Industries with respect to government procurement and customs matters.

Venezolana de Cementos CA

The Registrant rendered advice on U.S. laws, regulations and policies relating to international trade and the U.S. cement industry. The Registrant also represented the principal in connection with the negotiation of stock sales to non-U.S. customers.

Attachment 7

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

☒ Yes ☐ No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Banco Central do Brasil

On behalf of the foreign principal, the Registrant had discussions concerning the restructuring of the Brazilian external debt held by commercial bank creditors with Edwin Yeo, Counsellor to the President, Federal Reserve Bank of New York, on April 25, 1989.

Government of the Republic of Panama of which Eric Arturo Delvalle is the Legitimate President

On behalf of the foreign principal, the Registrant had discussions regarding Air Panama, Panamanian financial affairs, and other issues relating to operations of the Government of Panama within the United States with Richard Newcomb, Director of the Office of Foreign Assets Control, Department of the Treasury, on January 13, 18, 24, February 6, 7, 11, 27, March 2, 9, 20, 29, April 6, 7, 18, May 1, 2, 4, 1989; with Peter Secor, Foreign Service Officer--Class 3, Department of State, on January 12, 24, February 6, 7, 11, 27, March 2, 9, 20, 29, April 6, 7, 18, May 1, 2, 4, 1989; with William Hoffman, Chief Counsel, Office of Foreign Assets Control, Department of the Treasury, on January 24, February 6, 7, 1989; with Loren Dohm, Chief of Blocked Assets, Office of Foreign Assets Control, Department of the Treasury, on January 25, 1989; with Richard Wyrrough, Director of the Office of Panamanian Affairs, Department of State, on February 10, 1989; with Brent Scowcroft, National Security Advisor, on January

25, 1989; and with Michael Kozak, Principal Deputy Assistant Secretary for Inter-American Affairs, Department of State, on February 24, 1989, April 22, 1989.

On behalf of the foreign principal, the Registrant had numerous discussions and interviews with members of the media including the following: Steve Hedges, U.S. News and World Report, on May 10, 1989; with Pat Rogers, WOAI Radio, San Antonio, on May 10, 1989; with Patricia Ochs, Cable News Network, on May 11, 1989; with Robert Zelnick, ABC News, on May 11, 1989; with Lars Nelson, New York Daily News, May 11, 1989; with Robert Berkowitz, Financial News Network, on May 11, 1989; with Adam Nagourney, New York Daily News, on May 16, 1989; with Jill Abramson, Wall Street Journal, on May 18, 1989; and with Mr. Chatterjee, Village Voice, on May 25, 1989.

Republic of Venezuela

On behalf of the foreign principal, the Registrant had discussions regarding Venezuelan debt restructuring and financing with Edwin Yeo, Counsellor to the President, Federal Reserve Bank, on December 5, 6, 9, 16, 1988, January 3, 4, 5, 6, 9, 10, 11, 12, 18, 23, 24, 25, 26, 27, 30, 1989, February 1, 10, 15, 21, 22, 23, 27, 28, 1989, March 1, 3, 6, 7, 8, 9, 13, 14, 20, 21, 22, 28, 31, 1989, April 3, 4, 5, 11, 14, 19, 24, 25, 26, 1989, May 2, 5, 8, 9, 10, 11, 12, 1989, June 1, 1989; with James Fall, Acting Deputy Assistant Secretary of International Affairs (OASIA), Department of the Treasury, on January 4, 1989 March 3, 13, 1989, April 17, 1989; with Terence Checki, Vice President of Developing Nations Staff (Foreign Relations), Federal Reserve Bank, New York, on March 9, 1989; with Nicholas Brady, Secretary of the Treasury, on March 2, 9, 1989; with Russell Munk, Assistant General Counsel (International Affairs), Department of the Treasury, on March 17, 21, 24, 1989; with Ricki Tigert, Associate General Counsel, Federal Reserve Bank, on May 18, 1989; with Sam Cross, Executive Vice President of Federal Reserve Bank, on January 6, 1989; with Ted Truman, Staff Director, Division of International Finance, Federal Reserve Board, on January 24, 1989; and with David Mulford, Undersecretary for International Affairs, Department of the Treasury, on March 2, 1989, May 19, 1989.

ATTACHMENT NO. 8

14.(a) Receipts -- Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

 X Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.			
<u>Venezuela, Gov't of</u>			
12/06/88	Venezuela, Gov't of	Fees	\$ 59,911.25
12/06/88	Venezuela, Gov't of	Disbursements	20,076.79
12/29/88	Venezuela, Gov't of	Fees	124,345.00
12/29/88	Venezuela, Gov't of	Disbursements	19,134.39
01/26/89	Venezuela, Gov't of	Fees	144,927.50
01/26/89	Venezuela, Gov't of	Disbursements	11,912.26
02/28/89	Venezuela, Gov't of	Fees	170,780.00
02/28/89	Venezuela, Gov't of	Disbursements	79,203.46
05/19/89	Venezuela, Gov't of	Fees	588,386.00
05/19/89	Venezuela, Gov't of	Disbursements	91,603.37
		Total Fees	1,088,349.75
		Total Disbs.	221,930.27
<u>Joint Exchanges Committee</u>			
03/24/89	Joint Exchanges Committee	Fees	\$ 1,500.00
03/24/89	Joint Exchanges Committee	Disbursements	150.15
<u>London Int'l Financial Futures</u>			
12/14/88	London Int'l Financial Futures	Fees	\$ 5,700.00
12/14/88	London Int'l Financial Futures	Disbursements	436.23
01/31/89	London Int'l Financial Futures	Fees	1,900.00
01/31/89	London Int'l Financial Futures	Disbursements	83.86
03/24/89	London Int'l Financial Futures	Fees	5,000.00
03/24/89	London Int'l Financial Futures	Disbursements	108.19
		Total Fees	12,600.00
		Total Disbs.	628.28
<u>British American Arts Association (U.K.) Ltd.</u>			
02/06/89	British Am. Arts Assoc. (U.S.)	Fees	\$ 4,158.55

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>AMOK Limited</u>			
<u>Eldorado Resources Limited</u>			
<u>Uranerz Exploration and Mining Limited</u>			
<u>Cameco</u>			
12/05/88	Cameco	Fees	\$ 90.00
12/05/88	Cameco	Disbursements	3,555.14
12/09/88	Uranerz Exploration & Min. Ltd.	Fees	90.00
12/09/88	Uranerz Exploration & Min. Ltd.	Disbursements	3,555.14
12/15/88	Cameco	Fees	90.00
12/15/88	Cameco	Disbursements	3,555.14
01/17/89	Eldorado Resources Limited	Fees	8,754.00
01/17/89	Eldorado Resources Limited	Disbursements	16,915.99
01/17/89	Cameco	Fees	.77
01/17/89	Cameco	Disbursements	4,398.92
02/06/89	Uranerz Exploration & Min. Ltd.	Fees	2.25
02/06/89	Uranerz Exploration & Min. Ltd.	Disbursements	2,197.59
		Total Fees	9,027.02
		Total Disb.	34,177.92
<u>The Republic of Panama</u>			
12/13/88	Republic of Panama	Fees	\$ 142,288.99
12/13/88	Republic of Panama	Disbursements	7,711.01
04/26/89	Republic of Panama	Fees	104,654.55
04/26/89	Republic of Panama	Disbursements	3,780.72
		Total Fees	246,943.54
		Total Disbs.	11,491.73
<u>Korea Foreign Trade Association</u>			
01/04/89	Korea Foreign Trade Assoc.	Fees	\$ 74,591.94
01/04/89	Korea Foreign Trade Assoc.	Disbursements	8,563.51
<u>Banco Central Do Brasil</u>			
12/23/88	Banco Central Do Brasil	Fees	\$ 223,052.44
12/23/88	Banco Central Do Brasil	Disbursements	19,006.31
12/27/88	Banco Central Do Brasil	Fees	6,105.00
12/28/88	Banco Central Do Brasil	Fees	737,667.93
12/28/89	Banco Central Do Brasil	Disbursements	16,035.57
05/31/89	Banco Central Do Brasil	Fees	260,941.60
05/31/89	Banco Central Do Brasil	Disbursements	8,934.65
		Total Fees	1,227,766.97
		Total Disbs.	43,976.53
<u>Consejo Empresarial Mexicano (CEMAI)</u>			
12/28/88	Consejo Empresarial Mexicano	Disbursements	\$ 600.00
01/31/89	Consejo Empresarial Mexicano	Fees	2,400.00
02/13/89	Consejo Empresarial Mexicano	Fees	1,200.00
02/23/89	Consejo Empresarial Mexicano	Fees	9,400.00
02/23/89	Consejo Empresarial Mexicano	Disbursements	15,500.00

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Consejo Empresarial Mexicano (CEMAI) (cont.)</u>			
03/23/89	Consejo Empresarial Mexicano	Fees	2,194.28
03/23/89	Consejo Empresarial Mexicano	Disbursements	305.72
		Total Fees	15,194.28
		Total Disbs.	16,405.72
<u>Profilo Holding, A.S.</u>			
<u>Enka Holding Yatirim, A.S.</u>			
<u>Halk Sigorta T.A.S.</u>			
<u>Sezai Turkes-Feyzi Akkaya Construction Co.</u>			
<u>Iktisat Bankasi</u>			
<u>Ak-Pa Tekstil Ihracat Pazarlama, A.S.</u>			
<u>Fentex International Corp.</u>			
12/22/88	Halk Sigorta T.A.S.	Fees	\$ 5,042.52
12/22/88	Halk Sigorta T.A.S.	Disbursements	5,157.48
12/30/88	Ak-Pa Tekstil Ihracar Pazarlama	Fees	3,600.00
01/17/89	Enka Holding Yatirim, A.S.	Fees	3,600.00
01/17/89	Profilo Holding, A.S.	Fees	3,600.00
04/05/89	Iktisat Bankasi	Fees	18,242.52
04/05/89	Iktisat Bankasi	Disbursements	5,157.48
04/10/89	Ak-Pa Tekstil Ihracar Pazarlama	Fees	3,600.00
04/13/89	Profilo Holding, A.S.	Fees	3,600.00
04/18/89	Sezai Turkes-Feyzi Akkaya	Fees	10,200.00
05/11/89	Fentex International Corp.	Fees	3,600.00
05/17/89	Iktisat Bankasi	Fees	3,591.00
05/23/89	Profilo Holding, A.S.	Fees	3,600.00
05/26/89	Ak-Pa Tekstil Ihracar Pazarlama	Fees	3,600.00
		Total Fees	65,876.04
		Total Disbs.	10,314.96
<u>Fair Trade Center</u>			
03/15/89	Fair Trade Center	Fees	\$ 21,400.00
03/15/89	Fair Trade Center	Disbursements	628.69
<u>Int'l Bank for Reconstruction & Development</u>			
12/19/88	Int'l Bank for Recon. & Dev.	Fees	\$ 2,375.00
12/19/88	Int'l Bank for Recon. & Dev.	Disbursements	44.25
03/20/89	Int'l Bank for Recon. & Dev.	Fees	3,454.00
03/20/89	Int'l Bank for Recon. & Dev.	Disbursements	36.00
05/18/89	Int'l Bank for Recon. & Dev.	Fees	3,235.00
05/18/89	Int'l Bank for Recon. & Dev.	Disbursements	461.70
		Total Fees	9,064.00
		Total Disbs.	541.95
<u>Inter-American Development Bank (IDB)</u>			
02/17/89	Inter-Amer. Dev. Bank	Fees	\$ 3,454.00
02/17/89	Inter-Amer. Dev. Bank	Disbursements	36.00

Receipts (cont.)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Confederation</u>			
12/29/88	Embassy of Switzerland	Fees	\$ 18,140.00
12/29/88	Embassy of Switzerland	Disbursements	511.66
05/24/89	Embassy of Switzerland	Fees	14,680.00
05/24/89	Embassy of Switzerland	Disbursements	1,182.58
		Total Fees	32,820.00
		Total Disbs.	1,694.24
<u>State of Israel</u>			
12/30/88	State of Israel	Fees	\$ 265,877.31
12/30/88	State of Israel	Disbursements	34,122.69
05/17/89	State of Israel	Fees	47,075.19
		Total Fees	312,952.50
		Total Disbs.	34,122.69
<u>Israel Military Industries</u>			
12/30/88	Israel Military Industries	Fees	\$ 16,747.49
12/30/88	Israel Military Industries	Disbursements	720.89
12/31/88	Israel Military Industries	Fees	5,378.42
12/31/88	Israel Military Industries	Disbursements	1,231.31
01/11/89	Israel Military Industries	Fees	4,561.87
01/11/89	Israel Military Industries	Disbursements	13.79
01/17/89	Israel Military Industries	Fees	7,853.42
01/17/89	Israel Military Industries	Disbursements	2,303.29
02/28/89	Israel Military Industries	Fees	2,345.62
02/28/89	Israel Military Industries	Disbursements	72.85
03/13/89	Israel Military Industries	Fees	997.50
03/13/89	Israel Military Industries	Disbursements	129.62
05/04/89	Israel Military Industries	Fees	4,670.63
05/04/89	Israel Military Industries	Disbursements	721.52
		Total Fees	42,554.95
		Total Disbs.	5,193.27
<u>Asocolflores</u>			
12/06/88	Asocolflores	Fees	\$ 3,150.00
12/06/88	Asocolflores	Disbursements	1,865.78
01/13/89	Asocolflores	Fees	2,230.00
01/13/89	Asocolflores	Disbursements	1,249.61
03/06/89	Asocolflores	Fees	115,585.75
03/06/89	Asocolflores	Disbursements	22,936.91
04/20/89	Asocolflores	Fees	149.15
05/30/89	Asocolflores	Fees	585.50
05/31/89	Asocolflores	Fees	307.60
		Total Fees	122,008.00
		Total Disbs.	26,052.30

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of Canada</u>			
01/18/89	Government of Canada	Fees	\$ 2,716.25
01/18/89	Government of Canada	Disbursements	5,737.89
03/20/89	Government of Canada	Fees	29,868.50
03/20/89	Government of Canada	Disbursements	<u>13,162.05</u>
		Total Fees	32,584.75
		Total Disbs.	18,899.94
 <u>Airbus Industrie</u>			
12/30/88	Airbus Industrie	Fees	\$ 9,126.25
12/30/88	Airbus Industrie	Disbursements	1,946.67
 <u>Venezolana de Cementos CA</u>			
12/12/88	Venezolana de Cementos CA	Fees	\$ 18,370.02
12/12/88	Venezolana de Cementos CA	Disbursements	2,277.08
01/30/89	Venezolana de Cementos CA	Fees	92,943.70
01/30/89	Venezolana de Cementos CA	Disbursements	8,956.30
05/10/89	Venezolana de Cementos CA	Fees	35,864.96
05/10/89	Venezolana de Cementos CA	Disbursements	<u>10,151.47</u>
		Total Fees	147,178.68
		Total Disbs.	21,384.85

ATTACHMENT NO. 9

15.(a) Disbursements -- Monies

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 or 10 of this statement?

 X Yes No

- (2) transmitted monies to any such foreign principal?

 Yes X No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
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The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

Ambassador of the Swiss Confederation

Various	Lexis	Computer Research	\$ 622.80
Various	C & P Telephone	Telephone	18.64
Various	Xerox Corporation	Duplicating	260.55
Various	U.S. Postal Service	Postage	14.38
Various	A & P Employees	Cash Expenses	7.20
12/09/88	Downtown Courier	Courier	3.90
Various	Falcon Express	Courier	47.20
Various	Research Information Service	Document Retrieval	195.91
01/17/89	Bureau of National Affairs	Publications	40.00
01/17/89	Monitor Publishing Company	Publications	153.70
12/21/88	Superintendent of Documents	Publications	30.00
		TOTAL	\$ 1,394.28

The International Petroleum Exchange of London Limited

01/23/89	U.S. Postal Service	Postage	\$.45
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Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Joint Exchanges Committee</u>			
Various	Xerox Corporation	Duplicating	\$ 513.30
Various	U.S. Postal Service	Postage	15.37
Various	C & P Telephone	Telephone	22.02
		TOTAL	\$ 550.69

London International Financial Futures

Various	Xerox Corporation	Duplicating	\$ 73.50
12/15/88	U.S. Postal Service	Postage	1.80
02/01/89	C & P Telephone	Telephone	10.21
Various	A & P Employees	Cash Expenses	19.00
03/20/89	Federal Express	Courier	29.60
		TOTAL	\$ 134.11

London Commodity Exchange (1986) Limited
International Commodities Clearing House Ltd.
Grain & Feed Trade Association
The Metal Market & Exchange Company Limited
London International Financial Futures Exchange Limited

Various	Xerox Corporation	Duplicating	\$ 86.75
03/28/89	U.S. Postal Service	Postage	.90
03/20/89	Federal Express	Courier	50.40
04/13/89	Falcon Express	Courier	20.50
Various	C & P Telephone	Telephone	7.50
		TOTAL	\$ 166.05

Israel Securities Authority

Various	Xerox Corporation	Duplicating	\$ 368.25
06/01/89	C & P Telephone	Telephone	51.75
Various	A & P Employees	Local Transportation	65.25
05/05/89	A & P Employees	Cash Expenses	7.50
05/01/89	Lexis	Computer Research	365.50
04/29/89	Capitol District Information	Document Retrieval	92.34
		TOTAL	\$ 950.59

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>The State of Israel</u>			
Various	Allen W. Wasmund & Son	Printing	\$ 5,548.16
Various	The Association of the Bar of the City of New York	Duplicating	28.15
Various	Xerox Corporation	Duplicating	8,934.19
Various	A & P Employees	Local Transportation	1,365.09
Various	C & P Telephone	Telephone	718.30
Various	New York Telephone	Telephone	1,734.17
Various	A & P Employees	Cash Expenses	1,615.99
Various	Lexis	Computer Research	2,023.21
Various	Westlaw	Computer Research	104.40
Various	Archer Services	Courier	190.90
12/09/88	Downtown Courier	Courier	3.60
Various	Falcon Express	Courier	528.35
Various	Lotus Ride, Inc.	Courier	888.75
Various	United Parcel Service	Courier	25.04
Various	Federal Express	Courier	319.45
Various	Bridge Delivery Systems, Inc.	Courier	13.00
Various	Olympic Courier System, Inc.	Courier	71.80
04/28/89	Quick Service Messenger	Courier	10.95
Various	A & P Attorneys	Travel Expenses (Conf. with client)	5,871.58
Various	U.S. Postal Service	Postage	12.63
04/06/89	Washington College Law Library	Publications	20.00
04/12/89	American University Library	Publications	4.50
05/12/89	George Washington University	Publications	10.00
02/10/89	Research Information Services	Document Retrieval	180.50
Various	Washington Service Bureau, Inc.	Document Retrieval	504.95
		TOTAL	\$ 30,727.66

Israel Military Industries

Various	Xerox Corporation	Duplicating	\$ 1,462.18
Various	C & P Telephone	Telephone	163.54
01/15/89	New York Telephone	Telephone	44.71
Various	U.S. Postal Service	Postage	4.85
Various	A & P Employees	Local Transportation	42.25
Various	A & P Employees	Cash Expenses	40.89
Various	Lexis	Computer Research	464.90
Various	Westlaw	Computer Research	748.80
Various	Falcon Express	Courier	334.15
04/17/89	Grace Courier	Courier	12.00
		TOTAL	\$ 3,318.27

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of Canada</u>			
Various	Xerox Corporation	Duplicating	\$ 223.80
03/16/89	U.S. Postal Service	Postage	.45
Various	C & P Telephone	Telephone	61.65
Various	A & P Employees	Local Transportation	11.50
Various	A & P Employees	Cash Expenses	166.79
12/20/88	Federal Express	Courier	33.00
Various	Falcon Express	Courier	74.70
Various	Lexis	Computer Research	664.00
Various	APCO Associates	Professional Service fees	2,211.99
		TOTAL	\$ 3,447.88
<u>ASEA A.B.</u>			
Various	Xerox Corporation	Duplicating	\$ 90.95
Various	C & P Telephone	Telephone	72.60
Various	U.S. Postal Service	Postage	5.62
Various	A & P Employees	Local Transportation	43.24
Various	A & P Employees	Cash Expenses	139.72
Various	Falcon Express	Courier	22.25
12/07/88	Superintendent of Documents	Publications	15.00
02/15/89	World Bank Publications	Publications	6.95
03/24/89	Western Union Int'l Inc.	Telex	4.78
Various	APCO Associates	Professional Service fees	2,936.90
		TOTAL	\$ 3,338.01
<u>Korea Foreign Trade Association</u>			
Various	Xerox Corporation	Duplicating	\$ 5,723.75
Various	C & P Telephone	Telephone	1,749.82
Various	A & P Employees	Cash Expenses	3,314.93
Various	A & P Employees	Local Transportation	208.68
Various	U.S. Postal	Postage	7.97
Various	Falcon Express	Courier	277.65
Various	A & P Attorneys	Travel Expense (Conf. with client)	1,870.57
Various	Lexis	Computer Research	1,830.70
Various	APCO Associates	Professional Service fees	1,435.00
04/28/89	American Political Research	Publications	174.90
04/04/89	U.S. Chamber of Commerce	Publications	280.00
12/16/88	Millennium Society	Publications	140.00
		TOTAL	\$ 17,013.97

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>AMOK Limited</u>			
<u>Eldorado Resources Limited</u>			
<u>Uranerz Exploration and Mining Limited</u>			
<u>Saskatchewan Mining Development Corporation</u>			
Various	Xerox Corporation	Duplicating	\$ 490.57
Various	C & P Telephone	Telephone	114.73
Various	A & P Employees	Local Transportation	30.00
Various	A & P Employees	Cash Expenses	49.42
04/26/89	Falcon Express	Courier	10.05
Various	Federal Express	Courier	45.60
Various	APCO Associates	Professional Service fees	4,240.14
TOTAL			\$ 4,980.51

Profilo Holdings A.S.

Various	Xerox Corporation	Duplicating	\$ 529.67
Various	C & P Telephone	Telephone	725.79
Various	Western Union Int'l	Telex	18.98
Various	A & P Employees	Local Transportation	415.67
Various	A & P Employees	Cash Expenses	1,298.04
Various	A & P Attorneys	Travel Expense (Conf with client)	3,999.37
12/14/88	Institute of Holocaust & Genocide	Publications	15.00
01/27/89	DHL Airways, Inc.	Courier	206.00
Various	Falcon Express	Courier	151.10
12/31/88	Federal Express	Courier	8.75
Various	Lexis	Computer Research	606.17
01/01/89	Westlaw	Computer Research	16.20
Various	APCO Associates	Professional Service fees	15,793.17
TOTAL			\$ 23,783.91

International Commodities Clearing House Ltd.

Various	Xerox Corporation	Duplicating	\$ 35.50
Various	C & P Telephone	Telephone	1.32
03/15/89	New York Telephone	Telephone	6.67
TOTAL			\$ 43.49

Banco Central do Brasil

Various	Xerox Corporation	Duplicating	\$ 19,061.66
02/24/89	Western Reserve University	Duplicating	6.50
04/19/89	The Association of the Bar of the City of New York	Duplicating	58.02
04/17/89	Marshall Law Library	Duplicating	6.64
12/15/88	PACH Brothers	Duplicating	583.24
02/28/89	Disclosure	Duplicating	94.86
Various	U.S. Postal Service	Postage	8.65

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Banco Central do Brasil (Cont.)</u>			
Various	Western Union Int'l	Telex	37.20
Various	C & P Telephone	Telephone	2,261.37
Various	New York Telephone	Telephone	6,404.87
Various	A & P Employees	Local Transportation	4,117.16
Various	A & P Employees	Cash Expenses	3,201.20
04/28/89	Quick Service Messenger	Courier	11.25
Various	Falcon Express	Courier	1,170.55
Various	Downtown Courier	Courier	51.60
04/17/89	United Parcel Service	Courier	6.77
Various	DHL Airways	Courier	2,466.00
12/30/88	Archer Services	Courier	20.10
Various	Federal Express	Courier	776.15
04/17/89	Olympic Courier Systems, Inc.	Courier	12.00
04/18/89	Sureway Air Traffic Corporation	Courier	40.00
Various	Apple Courier Incorporated	Courier	56.30
Various	National News Agency	Publications	492.60
03/27/89	International Monetary Fund	Publications	69.50
02/15/89	Orbis Publications, LTD	Publications	495.00
Various	Superintendent of Documents	Publications	85.00
04/28/89	Williamson Publication	Publications	10.95
02/13/89	The Brookings Institution	Publications	13.00
05/12/89	George Washington University	Publications	20.00
05/17/89	Institute for Int'l Economics	Publications	28.00
Various	Lexis	Computer Research	3,785.55
04/01/89	Westlaw	Computer Research	19.80
04/28/89	Kroll Office Products, Inc.	Supplies	139.21
Various	A & P Attorneys	Travel Expense (Confs w/client and attending meetings in New York, Amsterdam and Brasilia)	29,397.83
01/17/89	Frank-Guenther Law, Inc.	Advertising	2,518.71
Various	Research Information Services	Document Retrieval	771.17
12/30/88	Norton Rose	Professional Service fees	7,171.34
04/17/89	District of Columbia Bar	International Trade Luncheon	20.00
Various	The Secura Group	Professional Service fees	494.50
12/29/88	J.J. Meaney	Utilities	85.33
		TOTAL	\$ 86,069.58

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of the Republic of Panama</u>			
Various	Xerox Corporation	Duplicating	\$ 1,882.10
Various	C & P Telephone	Telephone	261.43
03/06/89	U.S. Postal Service	Postage	.50
Various	A & P Employees	Local Transportation	258.58
Various	A & P Employees	Cash Expenses	16.52
Various	Federal Express	Courier	127.50
Various	Falcon Express	Courier	537.50
05/24/89	Strictly Business	Video Tape - FFN	
		Focus re Panama	24.98
Various	A & P Attorneys	Travel Expense (Conf. with client)	699.02
Various	State Department	Authentication Fees	40.00
		TOTAL	\$ 3,848.13
<u>Venezolana de Cementos CA</u>			
Various	Xerox Corporation	Duplicating	\$ 1,174.50
Various	C & P Telephone	Telephone	35.27
Various	A & P Employees	Cash Expenses	461.25
05/08/89	Lexis	Computer Research	59.76
		TOTAL	\$ 1,730.78
<u>Japan Fair Trade Center</u>			
Various	Lexis	Computer Research	\$ 411.40
Various	Xerox Corporation	Duplicating	988.92
Various	C & P Telephone	Telephone	86.28
Various	A & P Employees	Local Transportation	13.00
Various	A & P Employees	Cash Expenses	19.31
02/22/89	Falcon Express	Courier	20.10
Various	DHL Airways	Courier	469.00
Various	APCO Associates	Professional Service fees	264.30
		TOTAL	\$ 2,272.31
<u>Airbus Industrie</u>			
Various	Xerox Corporation	Duplicating	\$ 280.95
Various	C & P Telephone	Telephone	5.41
03/21/89	U.S. Postal Service	Postage	1.85
Various	A & P Employees	Cash Expenses	7.50
12/09/88	Falcon Express	Courier	8.00
		TOTAL	\$ 303.71

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Venezuela, Gov't of</u>			
Various	Xerox Corporation	Duplicating	\$ 28,924.32
12/30/88	Long's Bookbinders	Printing	303.33
12/16/88	American Bank Note Company	Printing	4,095.00
Various	C & P Telephone	Telephone	5,772.85
Various	New York Telephone	Telephone	2,502.04
Various	A & P Employees	Local Transportation	5,170.07
Various	A & P Employees	Cash Expenses	4,202.24
Various	A & P Attorneys	Travel Expense	
		(Negotiations and consultations w/client in New York and Caracas)	37,654.11
Various	Downtown Courier	Courier	17.10
Various	DHL Airways	Courier	1,896.00
Various	Federal Express	Courier	1,345.10
Various	Falcon Express	Courier	497.18
04/12/89	World Courier	Courier	4,850.00
Various	Grace Courier Service, Inc.	Courier	12.00
Various	Network Courier	Courier	112.00
03/24/89	Quick Service Messenger	Courier	8.25
12/07/88	Charles E. Simon	Information Acquisition	126.36
05/31/89	CUSIP Bureau	Registration Fee	74.00
Various	Lexis	Computer Research	985.43
Various	Westlaw	Computer Research	446.40
03/08/89	The Bond Buyer	Publications	7.75
Various	National News Agency	Publications	535.70
Various	Law Debenture Trust Corporation (England)	Process Agent Service fees	4,774.50
04/07/89	Banque Internationale a Luxembourg	Professional Service fees (listing fee re: bond issue)	8,666.84
Various	Elgardo Holzman	Translation Service fees	3,780.00
12/30/88	Lenz, Schluep, Briner & DeCoulon (Geneva, Switzerland)	Professional Service fees (Legal Service)	3,133.44
Various	CT Corporation System	Process Agent Service fees	3,256.00
12/16/89	Diaz, Egana, Aveledo & Requena (Caracas, Venezuela)	Professional Service fees (Legal Service)	6,449.00
Various	Slaughter and May (London and New York)	Professional Service fees (Legal Service)	143,246.00
01/11/89	Donnelly Receivables, Inc. (New York)	Professional Service (Printing fees)	10,921.96
02/09/89	The Venezuelan American Assoc. of the United States, Inc.	Continuing Education	75.00
		TOTAL	\$ 283,839.97

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Asociacion Colombiana de Exportadores de Flores (Asocolflores)</u>			
Various	Xerox Corporation	Duplicating	\$ 10,087.27
Various	U.S. Department of Commerce	Duplicating	164.44
Various	C & P Telephone	Telephone	2,128.83
Various	U.S. Postal Service	Postage	171.54
Various	A & P Employees	Local Transportation	746.44
Various	A & P Employees	Cash Expenses	1,242.41
Various	Lexis	Computer Research	1,837.09
02/01/89	Westlaw	Computer Research	518.40
Various	A & P Attorneys	Travel Expense (Conf. with client)	2,763.70
Various	Federal Express	Courier	251.00
Various	DHL Airways	Courier	143.00
Various	Falcon Express	Courier	1,330.80
Various	Colombian Consulate	Authentication Fee	48.00
Various	Western Union Int'l Inc.	Telex	16.77
Various	U.S. Department of Agriculture	Publications	482.00
02/15/89	National Journal, Inc.	Publications	44.95
Various	Clerk, U.S. Court of International Trade	Filing Fees	248.50
02/03/89	International Trade Commission	Document Retrieval	100.54
03/31/89	David Poage	Document Retrieval	19.00
05/31/89	Research Information Service	Document Retrieval	159.72
Various	APCO Associates	Professional Service fees	11,075.58
09/29/88	Shane Hunt	Professional Service fees	6,258.57
Various	Sparks Commodities, Inc.	Professional Service fees	20,495.20
Various	Ann Riley & Associates, LTD	Depositions	415.30
05/04/89	Tankoos Reporting Co.	Depositions	210.00
		TOTAL	\$ 60,959.05

Attachment 10

15(c). Disbursements-Political Contributions

During this 6-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things or value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

☐ Yes ☒ No*/

*/ However, the following persons who have filed Short-Form Registration Statements have made political contributions in connection with elections for federal offices:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>NANCY ABRAMOWITZ</u>			
1/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various
<u>WILLIAM BAER</u>			
1/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various
<u>PAUL BERGER</u>			
1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
5/23/89	\$ 300.00	Larry Smith for Congress	Larry Smith
<u>VIVIAN BERZINSKI</u>			
4/15/89	\$ 93.33	Arnold & Porter Partners PAC	Various
<u>PETER BLEAKLEY</u>			
1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

BROOKSLEY BORN

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

HOWARD CAYNE

1/15/89	\$ 69.75	Arnold & Porter Partners PAC	Various
4/15/89	\$ 69.75	Arnold & Porter Partners PAC	Various

WHITNEY DEBEVOISE

1/15/89	\$ 93.25	Arnold & Porter Partners PAC	Various
4/15/89	\$ 93.25	Arnold & Porter Partners PAC	Various

JAMES DOBKIN

1/15/89	\$ 225.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 225.00	Arnold & Porter Partners PAC	Various

A. PATRICK DOYLE

6/13/88	\$ 125.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 125.00	Arnold & Porter Partners PAC	Various

DOUGLAS DWORKIN

1/15/89	\$ 105.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 105.00	Arnold & Porter Partners PAC	Various

THOMAS DWYER

3/27/89	\$ 340.00	Arnold & Porter Partners PAC	Various
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JAMES FITZPATRICK

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

MELVIN GARBOW

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

JOSEPH GUTTENTAG

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

KENNETH HANDAL

5/1/89	\$ 50.00	Republican National Committee	Various
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RICHARD HUBBARD

1/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various

JOHN H. JACKSON

5/10/89	\$ 50.00	Democratic National Committee	Various
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ROBERT J. JONES

1/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various

KENNETH JUSTER

1/15/89	\$ 69.75	Arnold & Porter Partners PAC	Various
4/15/89	\$ 69.75	Arnold & Porter Partners PAC	Various

HADRIAN KATZ

1/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various

ABE KRASH

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

KENNETH LETZLER

1/15/89	\$ 187.50	Arnold & Porter Partners PAC	Various
4/15/89	\$ 187.50	Arnold & Porter Partners PAC	Various

PATRICK MACRORY

1/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various

ROBERT MANNION

1/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 115.00	Arnold & Porter Partners PAC	Various

MICHAEL MIERZEWSKI

1/15/89	\$ 69.75	Arnold & Porter Partners PAC	Various
4/15/89	\$ 69.75	Arnold & Porter Partners PAC	Various

NANCY MINTZ

1/15/89	\$ 150.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 150.00	Arnold & Porter Partners PAC	Various

BRUCE MONTGOMERY

1/15/89	\$ 225.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 225.00	Arnold & Porter Partners PAC	Various

CLAIRE READE

1/5/89	\$ 81.67	Arnold & Porter Partners PAC	Various
4/15/89	\$ 81.67	Arnold & Porter Partners PAC	Various

ANDRE REIMAN

1/15/89	\$ 105.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 105.00	Arnold & Porter Partners PAC	Various

DANIEL REZNECK

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

WILLIAM ROGERS

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

ROBERT D. ROSENBAUM

4/15/89	\$ 300.00	Arnold & Porter Partners PAC	Various
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STANFORD ROSS

1/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 250.00	Arnold & Porter Partners PAC	Various

RICHARD SCHIFTER

1/15/89	\$ 93.25	Arnold & Porter Partners PAC	Various
4/15/89	\$ 93.25	Arnold & Porter Partners PAC	Various

PETER K. SCHMIDT

1/15/89	\$ 125.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 125.00	Arnold & Porter Partners PAC	Various

LAWRENCE A. SCHNEIDER

1/15/89	\$ 125.00	Arnold & Porter Partners PAC	Various
2/5/89	\$ 35.00	DNC/Federal Account	Various
4/15/89	\$ 125.00	Arnold & Porter Partners PAC	Various

SCOTT SCHREIBER

1/15/89	\$ 125.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 125.00	Arnold & Porter Partners PAC	Various

NORMAN SINEL

1/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 200.00	Arnold & Porter Partners PAC	Various

JEFFREY SMITH

4/15/89	\$ 133.33	Arnold & Porter Partners PAC	Various
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MARK STUMPF

1/15/89	\$ 150.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 150.00	Arnold & Porter Partners PAC	Various

STEVEN G. TEPPER

1/15/89	\$ 62.50	Arnold & Porter Partners PAC	Various
4/15/89	\$ 62.50	Arnold & Porter Partners PAC	Various

DANIEL WALDMAN

1/15/89	\$ 69.75	Arnold & Porter Partners PAC	Various
9/13/88	\$ 69.75	Arnold & Porter Partners PAC	Various

ROBERT WINTER

1/15/89	\$ 225.00	Arnold & Porter Partners PAC	Various
4/15/89	\$ 225.00	Arnold & Porter Partners PAC	Various

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No X

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes */ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Patrick FJ Macrory
Signature

Patrick FJ Macrory

Please type or print name of signatory on the line above

Partner

Title

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

89 JUL 25 5:10 PM
RECEIVED
DEPT. OF JUSTICE
CRIMINAL DIVISION
Date

*/ Attached is a copy of a January 25, 1989 letter. During the six month period ended June 4, 1989, Registrant did not disseminate any other material (except material filed in the course of litigation or established agency proceedings).